

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

HOPE A. THOMAS,)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-20-444-G
)	
CSAA INSURANCE SERVICES, INC.,)	
)	
)	
Defendant.)	

**APPLICATION TO ENLARGE PLAINTIFF’S DISCOVERY
RESPONSES DEADLINE BY 10 DAYS**

The Plaintiff respectfully request this Court enlarge the Plaintiff’s discovery responses to the Defendant by ten (10) days, or until December 7, 2020¹. In support of this application the Plaintiff show as follows:

1. This is the first application to enlarge the discovery response deadline.
2. The current deadline for the Plaintiff to submit her discovery responses to the Defendant is November 25, 2020.
3. As previously reported to this Court, Plaintiff’s mother is terminally ill and is near death.
4. For the past several days Plaintiff has been with her mother and has been out-of-contact with her counsel. As a result, counsel has not been able to complete responses to Defendant’s interrogatories and requests for production.
5. Plaintiffs’ counsel has attempted to confer with Defendant’s counsel who is out of the office through next Monday and, therefore, has not responded to

¹ Dates falling on a weekend have been adjusted to the following Monday.

Plaintiff's request for this enlargement.

WHEREFORE, Plaintiff respectfully request the Court enlarge the Plaintiff's deadline to respond to Defendant's discovery by ten (10) days, or until December 7, 2020.

RESPECTFULLY SUBMITTED THIS 25th DAY OF NOVEMBER 2020.

s/ Mark Hammons

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CERTIFICATE OF SERVICE

A true copy of the foregoing was filed and served by use of this Court's ECF system of filing and service on this 25th day of November 2020 to opposing counsel:

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s/Mark Hammons